

[date], 2016

Ms. Audrey Hollins
Office of Professional Competence, Planning and Development
State Bar of California
180 Howard Street
San Francisco, CA 94105-1639

Re: Proposed Rule of Professional Conduct 5.4 [1-320]
Financial and Similar Arrangements With Nonlawyers

Dear Ms. Hollins:

The Professional Responsibility and Ethics Committee of the Los Angeles County Bar Association (“PREC”) appreciates the opportunity to comment on the draft rules of conduct (the “Proposed Rules”) proposed by the State Bar’s Commission for the Revision of the Rules of Professional Conduct (the “Rules Revision Commission”). Please see our letter dated [date], 2016, describing PREC and praising the efforts of the Rules Revision Commission.

PREC finds the reference to “other organization” in paragraph (b) of Proposed Rule 5.4 [Financial and Similar Arrangements With Nonlawyers (current Rule 1-320)] to be overbroad and recommends that the language in this paragraph be clarified by adding “for a profit” to the end of the paragraph. Such a change would parallel the language used in the beginning portion of paragraph (d) of this Rule.

Thank you again for the opportunity to comment on the Proposed Rules.

Very Truly Yours,